

Worksheet for Technical Review of Working Draft of Proposed Permit

Company Name:	Dynamic Industries, Inc.	AI #: 34017	TEMPO Activity No:
Facility Name:	Topside	Remarks Submitted by:	Greg Cates
Permit Writer:	Tommy Mennet	Permit Writer Email address:	Tommy.Mennet@LA.GOV

Instructions

Permit Reference – Indicate specific portion(s) of the permit to which the remark relates (i.e. “Specific Condition 120”, or “Section II Air Permit Briefing Sheet”, etc.).

Remarks – Explain the basis for each remark. Provide regulatory citations where possible. If the remark is made due to an error or omission in the permit application this must be noted and the revised information *must be submitted*. Revised information may be submitted separately from this worksheet. Please be aware that revised information must be submitted in writing and certified by the Responsible Official, and if necessary, by a Professional Engineer licensed in Louisiana. *Please Note:* New or additional equipment, processes or operating conditions not addressed in the original permit application will be addressed on a case-by-case basis. The Department reserves the right to address such changes in a separate permit action.

DEQ Response – ***DO NOT COMPLETE THIS SECTION.*** This section will be completed by Air Permits Division of DEQ, included in the proposed permit package and made available for public review during the public comment period.

- Additional rows may be added as necessary.

- Completed Form shall be emailed to the Permit writer in MS Word compatible format within the deadline specified in the email notification.

Permit Reference	Remarks	Air Permits Division Response (for official use only)
Page 2, Fuel Storage	Can a generic statement be added about adding additional pressure tanks, facility may need additional tanks due to expansion. Can a general statement give this option?	If additional pressure tanks are added, a case-by-case insignificant activity or permit modification, as appropriate, will need to be submitted.
Page 3, 3j)	Add "when possible" after solvents. (III Proposed	Made change.
IX Insignificant Activities	Request a method of listing new tanks as facility grows without having to re-write permit. Would it be acceptable to keep a list at facility and send a letter to LDEQ should other small tanks be added?	If additional tanks are added, a case-by-case insignificant activity or permit modification, as appropriate, will need to be submitted.
Specific Requirements		
ARE002 18	What compliance report is the agency speaking of? Is this the TV Annual and Semi-annual reports?	Added additional language to Specific Condition 18 to clarify reporting procedures.
EQT001 67	Will this require facility personnel to become qualified to read opacity? If so, what records does the agency wish to be kept. These are small rental compressors	There is no reporting or record keeping for this regulation per LAC 33.III Chapter 13. Anyone who reads opacity as a condition of regulations has to be certified.

Permit Reference	Remarks	Air Permits Division Response (for official use only)
Specific Requirements		
EQ001 72 cont.	Can facility use fuel purchase rather than daily usage? Numerous small compressors would make individual readings very difficult. Facility keeps accurate records on diesel purchase. The section switches between monthly and daily monitoring. Monthly would be more practical for this operation.	Changed daily readings to monthly for Specific Requirements 68, 70, and 72.
GRP002	Define this source	Entire Facility. Added in permit.
GRP003 137	Could this section be modified to round numbers off? Xylene 19.00 Tons Toluene 14.00 Tons. leaving the CAP at 51.00 Tons, with emissions < MER could the identified TAPS individual limit be set to 9.00 Tons?	See terms in Specific Condition 137.
GRP003 141	Round off Total VOC to 107 Tons and Taps to 51 tons. .	Total VOC and TAPs were rounded off in the Specific Condition 137 and 141.
GRP003 General	The CAP is listed as Total Paint Emission Cap. I assume that this also includes the emissions from Solvent and Thinners. Could this be better defined.	Changed to Total Paint, Solvent, and Thinner Emission Cap
General Comment	On the CAP, the way it reads is that we gave n-Butyl Alcohol an estimated limit of 5.56 tons per year, but we can exceed that amount as long as we do not go above the CAP and the MER. IS that correct? This also applies to TAPs that are not specifically addressed in the permit?	Yes.